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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF HEATHER L.
RICHARDSON IN SUPPORT OF
FACEBOOK, INC.'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
SPECIAL MASTER'S ORDER
FOLLOWING MAY 17, 2022 HEARING
REGARDING PRODUCTION OF NAMED
PLAINTIFF DATA**

1 I, Heather L. Richardson, hereby declare as follows:

2 1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for
3 Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the
4 State Bar of California. I submit this declaration in support of Facebook’s Administrative Motion To
5 File Under Seal Special Master’s Order Following May 17, 2022 Hearing Regarding Production Of
6 Named Plaintiff Data. I make this declaration on my own knowledge, and I would testify to the matters
7 stated herein under oath if called upon to do so.

8 2. Attached as **Exhibit A** is a true and correct **redacted** version of the Special Master’s
9 Order Following May 17, 2022 Hearing Regarding Production Of Named Plaintiff Data (the
10 “Order”).

11 3. Attached as **Exhibit B** is a true and correct **unredacted** version of the Order.

12 4. Facebook proposes to seal limited portions of the Order that contain confidential
13 information regarding the properties of a Facebook data storage system. The Order quotes a portion
14 of the December 10, 2021 Declaration of Mengge Ji In Support Of Facebook’s Motion For
15 Reconsideration Of The Special Master’s Order Regarding Plaintiffs’ Motion To Compel Production
16 Of Plaintiff Data, which Facebook attached to an April 18, 2022 letter submission to the Special
17 Master. Facebook previously sought to file this portion of the Declaration under seal in this matter,
18 *see* Dkt. 814-1 at 0036 ¶ 16, and the Court granted Facebook’s motion to seal. Dkt. 844.

19 5. I am informed and believe that Facebook’s data systems are key components of its
20 business that set it apart and ahead of its competitors, and if publicly disclosed, competitors could use
21 the confidential information within Facebook’s proposed redactions to improve their own methods
22 for managing high volumes of data from interactions with large numbers of third parties.
23 Additionally, I am informed and believe that bad actors could use this confidential information to
24 better understand Facebook’s data systems and target specific repositories of data, potentially
25 harming Facebook and its users.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed on June 15, 2022 in Los Angeles, California.

3
4 /s/ Heather L. Richardson

5 Heather L. Richardson
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